

May 20, 2021

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**VIA ECF**

Hon. Eric N. Vitaliano  
United States District Court, Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *Shepherd v. Google LLC, et al.*, Case No. 21-cv-799 (ENV) (VMS)**

Judge Vitaliano:

This firm represents Defendant Google LLC (“Google”) in the above-referenced action. We write to respectfully request a stay of current deadlines on the case, or in the alternative, a 30-day extension of time for Google to respond to the Complaint. The parties have reached a settlement in principle and are in the process of finalizing the agreement in order to get a stipulation of dismissal with prejudice of all claims on file.

The current deadline for Google to respond to the Complaint is May 20, 2021; a 30-day extension would make the new deadline June 21, 2021. There have been three previous requests for an extension of this deadline: one made by former Defendant, id Software (which Google joined), on February 16, 2021; and two made by Google on March 22, 2021, and April 19, 2021, all of which were granted. The prior extensions were to provide the parties with time to discuss potential settlement. The current stay/extension is being requested in order to provide Google and the Plaintiff additional time to finalize and execute a settlement agreement and get a stipulation of dismissal with prejudice of all claims on file. Staying all current deadlines, or in the alternative, granting a 30-day extension will facilitate final disposition of the case. Plaintiff has no objection to this request.

We thank the Court for its time and attention to this matter and remain available at the Court’s convenience to address any questions or concerns.

Respectfully submitted,

/s/ Dennis C. Hopkins

Dennis C. Hopkins

Cc: James Kelly